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1 Most ecosystems are fairly resistant to change and
 2 are fairly resilient and bounce back from stress. This
 3 system does not. It is right on the edge of instability.
 4 For example, on a recent article published in Environmental
 5 Health Perspectives, Volume 110, Number 2, February 2002,
 6 published by the National Institute of Health, entitled
 7 "Dust in the Wind," quotes the work of Paul Genoe and
 8 others, with NASA, who have used the go-cart model to
 9 identify ten main sources of global dust events on the face
 10 of the earth.

11 They include Patagonia, the Alta Plato, the Sahel
 12 region, the Sahara, Namibian desert lands, the Indus Valley,
 13 Telomeric desert, the Goby Desert, the Lake Erie basin and
 14 the Salton Sea of southern California. This is done by an
 15 extensive that NASA uses that the university -- I can't
 16 think this -- I have forgotten where he's from. He's at the
 17 Georgia Institute of technology.

18 So, there is definite, definite proof that -- this
 19 was based on dust particle sizes from 0.1 to 6.0 microns of
 20 radius. Particles as large as ten microns, PM 10, can
 21 deposit in the lung airways and cause bronchial airway
 22 constriction. Particles less than 2.5 microns are now
 23 believed to have the greatest effects on human health.

24 Imperial County currently has asthma hospital
 25 discharge rates for children 2.4 times higher than any

Response to Comment P2-54

The commenter refers to a recent article in Environmental Health Perspectives entitled "Dust in the Wind", Volume 110, No. 2, February 2002, p. 80 (Ginoux et al. 2002). This article refers to research by Paul Ginoux and others at the Georgia Institute of Technology. The article indicates that Ginoux and his colleagues have identified 10 main sources of global dust events, including the Salton Sea. Mr. Ginoux was contacted to determine the accuracy of the article in reporting the Salton Sea as one of 10 main sources of global dust. His email response, dated 5/24/2002, indicates that the source in question should have been Owens Lake, not the Salton Sea.

Also, please refer to the following Master Responses in Section 3 of this Final EIR/EIS: *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan*; *Air Quality—Health Effects Associated with Dust Emissions*; and *Air Quality—Wind Conditions at the Salton Sea*.

1 county in California. While asthma is a complex disease,
2 air quality has a definite affect on any child with impaired
3 lung function.

4 And as birds have lungs, we are always concerned
5 about them too, but we have less data on the what effects
6 on. The decrease of the size of the Salton Sea as other
7 people have mentioned may expose many miles of seabed to
8 winds, and it is very important whether we look at those
9 winds in winter and summer because the character of the dust
10 varies between cold and warm temperatures.

11 We feel that the EIS/EIR does not address and does
12 not include such NASA data as available in this potential
13 threat to both human and animal health. And any decrease in
14 the size of the Salton Sea can lead to exposure of very
15 large amounts of dust, which will add to this global dust
16 problem.

17 Secondly, we feel that the inflow of the nutrients
18 to the Salton Sea, especially phosphorous, has resulted in
19 the development of a hypereutrophic sea with very high
20 productivity. The productivity has produced a fishery that,
21 while world class, is according to several papers published
22 in the Journal of Ecological Modeling recently, produced so
23 many fish, that like an overcrowded aquarium produces fish
24 which are unhealthy and provide a high number of sick fish,
25 which are easily caught by fish-eating birds.

Response to Comment P2-55

Relative to the Baseline, the reduced inflow under the Proposed Project likely would reduce phosphorus loading to the Salton Sea. Development of a TMDL, if appropriate, would be pursued through a separate process. Refer to the Master Response on *Hydrology – TMDLs* in Section 3 of this Final EIR/EIS.

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1 As most of these fish are located in the shallow
2 areas of the sea, any system which is concerned with changes
3 in inflow to the sea should deal with either mitigation or
4 changes or respect for TMVL values which will lower the
5 eutrophication of the Salton Sea.

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6 While the environmental community would like to put
7 ecological balance in favor of nature, in reality a
8 sustainable system calls for a balance between human and
9 nature. It is my feeling that the Salton Sea restoration
10 project was calling for a balanced approach through
11 ecosystem health, which was not current situation in the
12 Salton Sea watershed.

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13 We are also very concerned with the rules and
14 decisions that we are making today, while only pointing to a
15 single transfer of water will have profound effects on
16 habitat and the position of nature. The ever growing
17 contest between urban ag and nature water users.

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18 Using Department of Water Resources estimates, the
19 San Francisco Chronicle predicted by 2020 that the current
20 water system would fall short of California's needs by as
21 much as 4.2 million acre-feet in a good year and nearly
22 twice that in a drought year. One can see the handwriting
23 on the wall and the water words of the future and their
24 effects on habitat from our standpoint.

25 Again, we have lost 92 percent of our wetlands in

Response to Comment P2-56

Comment noted.

Response to Comment P2-57

Without a specific reference to a part of the Draft EIR/EIS, this comment is too general to respond to. Comment noted.

Response to Comment P2-58

The evaluation of impacts to biological resources of the Salton Sea is based on assessing changes in the values provided by the Sea, and subsequently, how groups of species using these values could be affected. For example, shorebirds are addressed in the evaluation of changes in Salton Sea invertebrate resources, and of changes in the extent of mudflat and shallow water habitat. An evaluation of the effects of the Proposed Project on each species individually is not necessary to disclose the nature and magnitude of the Project's impacts on biological resources or to determine their significance.

Response to Comment P2-59

Please refer to the Master Response on *Other—Growth Inducement Analysis* in Section 3 of this Final EIR/EIS.

1 California and many of these are in pearl. As a person who
2 has been involved in the restoration of a 20-acre model
3 march system in Tijuana, I understand very well that we do a
4 very poor job of restoration on anything because our
5 knowledge of wetland dynamics is very rudimentary.

6 The Salton Sea has been well documented as the
7 refueling point for millions of birds and breeding grounds
8 for a hundred species. The changes in the sea not only
9 affect the covered species, plus the 96 species out of 400,
10 but all avian life that uses the sea.

11 The effects on 350 species are poorly covered by
12 the SIS/EIR. The Christmas Bird counts and the white-faced
13 Ibis have increased dramatically and show us that over the
14 next 75 years, which we are talking about here, we need to
15 preserve as much habitat as possible.

16 We are living in one of those odd in between
17 periods which sometimes insert themselves into historical
18 time. Interval entwined which is all together determined by
19 things that are no longer by things that are not yet and I
20 think we are at a moment of truth at that point in time.

21 Thank you.

22 MS. CARD: Thank you. Duncan McPetridge. Then
23 Jack Paxton. Please state your name.

24 MR. MCFETRIDGE: My name is Duncan McPetridge. I'm
25 chairman of SOPAR. I live in Descanso. We are here today

Response to Comment P2-60

Comment noted. Also, please refer to the Master Response on *Other—Growth Inducement Analysis* in Section 3 of this Final EIR/EIS.

Response to Comment P2-61

Please refer to the Master Response on *Other—Growth Inducement Analysis* in Section 3 of this Final EIR/EIS.

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1 to agree strongly with the other commentators that mentioned
2 the growth inducing impacts of this project.

3 It seems incredible that the draft EIR has come to
4 the conclusion that there are no growth inducing or
5 cumulative impacts for the service area -- San Diego water
6 service area. We would also stress that the alternative
7 section is completely inadequate.

P2-60

8 Ladies and gentlemen, we all know that San Diego is
9 experiencing five resource crises. Two are in a state of
10 emergency. A housing crisis, beach pollution crisis,
11 transportation crisis, infrastructure crisis and an
12 environmental crisis. It would be social insanity to
13 deliver support for a ship that is headed for disaster.

P2-61

14 You must have in your alternative section a
15 regional growth management plan that mitigates for any
16 increase of supplies to this area that is headed in the
17 wrong direction. We think it is -- defies reason that
18 statements in the document that you are simply -- and I'm
19 reading out of your draft EIR -- you are simply supplying
20 water for projected demand -- population demand.

21 Ladies and gentlemen, that won't hold up in court.
22 The current growth patterns have led to those crises I'm
23 mentioning. Those growth population projections have no
24 planning basis behind them. So, we cannot provide more
25 water for this inadequate system here.

P2-61

1 So, to repeat, you are asking the public to pay up
2 front for the production and the supply of a vital resource,
3 which will be privatized and wasted in a sprawl city. We
4 will be submitting more comments for the record before the
5 due date.

6 Thank you.

7 MS. CARD: Thank you. Jack Paxton. Then Suzanne
8 Michel. Mr. Paxton will not be making a statement in the
9 record. He would like to submit this in writing. Okay. It
10 is submitted in the record. Thank you.

11 Susan Michelle. Then David Younkman.

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12 MS. MICHEL: Hi. My name is Susan Michel, and
13 today I'm representing the Southern California Watershed
14 Alliance and also Clean Water Action. Both of these
15 organizations, along with a coalition of other organizations
16 are very concerned about the basically zero emphasize
17 concerning environmental justice issues especially in urban
18 San Diego.

P2-63

19 First off, to say that water transfers do not
20 induce urban growth I think if you talk to the consultants
21 and as somebody who has a Ph.D. and does research on this is
22 poor research.

23 If you look at the literature review on this topic
24 by Mark Rizner, Donald Werster, Bob Gogly, Norris Hundley,
25 Gary Rutherford, and including myself, water transfers do

Response to Comment P2-62

Since the Lead Agencies do not consider the Proposed Project growth-inducing (refer to the Master Response on *Other—Growth Inducement Analysis* in Section 3 of the Final EIR/EIS) and physical changes to the environment in the SDCWA service area have not been identified, environmental justice issues were not identified for the SDCWA service area. Rather, the Project would benefit the SDCWA service area and its minority and low-income populations in the form of increased water supply reliability. All of the communities benefiting from the Project (SDWCA, MWD, CVWD, and IID) form a reference population, against which the impacted population (for any significant adverse impacts) is compared. For additional information, refer to subsection 3.15 in Section 4.2, Text Revisions of the Final EIR/EIS.

Response to Comment P2-63

Please refer to the Master Response on *Other—Growth Inducement Analysis* in Section 3 of this Final EIR/EIS.

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1 induce urban growth and what we are really concerned about
2 is urban sprawl.

Response to Comment P2-64

Refer to response to Comment P2-62.

P2-64

3 I would like to read you a statement written by a
4 coalition of environmental justice organizations and they
5 say "water management decisions, especially those with made
6 -- made without a connection to land use can promote sprawl
7 and can result in increased infrastructure costs to urban
8 residents as well as increased concentrations of non-point
9 source pollution in urban streams and water ways.

Response to Comment P2-65

Comment noted.

P2-65

10 Our community already suffer from deteriorating
11 infrastructure and polluting industries. And we want to
12 ensure that these IID transfers do not add to these
13 burdens."

14 I would also like to agree with the previous
15 comments and I'm very specifically talking about urban
16 expansion, not urban population overgrowth. I have a few
17 principles to add Kevin Doyle's.

18 First off, that any transfer of water must not
19 directly or indirectly induce urban expansion that will
20 generate urban run-off and other contaminants, such as MTBE,
21 for example, inconsequently impair source water quality of
22 local surface and ground water facilities.

23 My research is now documenting that this is
24 occurring in San Diego County. One of the largest ground
25 water basins in the San Diego River watershed now has MTBE

1 contamination. When brought before the water board what to
2 do, the simple answer was, okay. We will just import more
3 water.

4 Problem with that. \$565 in acre-foot to import
5 more water to that small community and that's in Lakeside,
6 California. Locally produced ground water supplies is \$65
7 an acre-foot. The community is outraged that they are going
8 to have to do this, and there's very little emphasis on
9 source water protection, especially from the land use
10 planning agencies especially with the San Diego County.

11 My second principle is that the each community and
12 Water District to receive these transfers need to be
13 provided an opportunity to be informed of the full costs of
14 transferred water and how these costs compare to locally
15 produced water supply costs and also water produced via
16 demand management.

17 Each community and Water District to receive these
18 transfers will be informed that the transfer is not a
19 permanent right to the community, but instead a leased --
20 but instead leased water subject to the demands of a water
21 market, and we are talking only about a 45-year lease.

22 Any transfer of water must not directly or
23 indirectly induce urban expansion that will result in
24 habitat loss, fragmentation or perforation of endangered and
25 threatened species. Any transfer of water must not directly

Response to Comment P2-66

The purpose of the Draft EIR/EIS is to evaluate the environmental and related socioeconomic effects of the Proposed Project and Alternatives. Section 3.14, Socioeconomics, includes the information necessary to evaluate such effects.

Response to Comment P2-67

The commenter is correct that under the IID/SDCWA Transfer Agreement, the water transfer under the Proposed Project to SDCWA does not confer a permanent right to the water from IID to SDCWA. However, after the initial term of the agreement (i.e., after 45 years), IID and SDCWA each have the option to extend the terms of the agreement for 30 additional years.

Response to Comment P2-68

Refer to response to Comment P2-40.

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1 or indirectly induce urban expansion that will generate
2 urban run-off and consequently result in the impairment of a
3 water body under Section 303D of the Clean Water Act.

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4 Right now what we are doing with urban expansion is
5 we are restoring our precious riparian habitat. So, we are
6 doing two things. We are destroying wetlands out in the
7 Salton Sea and the Colorado River delta, and we are
8 destroying wetlands right here in our coastal watersheds.
9 These birds have no place to go. Over 90 percent of coastal
10 waters and wetlands have been destroyed.

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11 Any transfer of water must not result in an
12 increase of importation of salts to a local community or
13 watershed. Ramona Water District, for example, from
14 Colorado River water imports 11 tons of salt a year. They
15 don't want this water.

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16 And finally and also, water transfer costs and
17 growth inducing impacts will be an element of any general
18 planned process for city and counties. I also agree that
19 the alternatives examined -- especially the costs associated
20 with demand management, reclaimed water and ground water
21 desalination, not even on your blueprint, and it is for MWD,
22 need to be more thoroughly analyzed.

23 And, you know, one of the things is I was in Los
24 Angeles a couple of months ago and they were so proud that
25 they had one million low-flush toilets. And they had a

Response to Comment P2-69

Comment noted.

Response to Comment P2-70

The commenter requests that the Project not result in an increase of importation of salts into a community or watershed. Less water will be imported in the IID water service area and Salton Sea subregions; therefore, these areas will not experience an increase in the importation of salts.

Under the SDCWA/MWD Exchange Agreement, SDCWA would receive, for use in the SDCWA service area, the same blend of water from MWD that it currently receives from MWD. That is, the blending of Colorado River water with SWP water and other MWD water sources would remain the same, and no measurable change in water quality or quantity would occur in the SDCWA service area as a result of implementing the Proposed Project and the SDCWA/MWD Exchange Agreement.

As for the MWD service area, it will receive the same blend of Colorado River and State Water Project water it currently receives with implementation of the Project.

In CVWD, the increased use of Colorado River water for groundwater recharge would increase the TDS of groundwater near the proposed recharge basins, exceeding secondary (aesthetic) drinking water standards. This effect is a significant and unavoidable adverse impact that cannot be feasibly mitigated.

Response to Comment P2-71

Refer to the Master Responses on *Other—Growth Inducement Analysis* and *Other—Desalination in the SDCWA Service Area and Comments Calling for Increased Conservation* in Section 3 of this Final EIR/EIS.

Response to Comment P2-72

Effects of the Proposed Project on Mexico were identified and addressed in the Draft EIR/EIS in Section 3.16. The analysis in the Draft EIR/EIS found that changing the point of diversion from Imperial Dam to Parker Dam for water transferred to SDCWA and/or MWD would not change the quantity of Colorado River water that would flow to Mexico because the same amount of water would be taken off the River under the Proposed Project as compared to the Baseline—only the diversion point would change. Similarly, changing the point of diversion will not effect the salinity of flows to Mexico.

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1 tremendous outreach to the minority communities. And I said
2 what's the deal with San Diego, and everybody said I don't
3 know. They are just not -- they are not aggressive about
4 it.

5 We need to start going in this direction. We need
6 to start working with low income and minority communities
7 about demand management. And I finally would like to agree
8 with the comments of Rick Van Schoik. We do have treaty
9 obligations under the UN for the Colorado River delta
10 biospear preserve.

11 We do have to recognize that. That is not analyzed
12 in the EIR. Mexico at one point will start pursuing --
13 thank you -- our obligations to stop the deterioration of
14 that Colorado River delta. So, I agree with Dr. Van Schoik
15 also that we need to incorporate Mexico as part of the
16 analysis, and believe it or not I think we can save a lot of
17 money if we look south to start solving these problems and
18 work with Mexico instead of just being so bull-headed about
19 not working at all with Mexico and spending more and more
20 money on habitat restoration.

21 Thank you.

22 MS. CARD: Thank you. David Younkman. Then -- I
23 think that's Peter MacLaggan.

24 MR. YOUNKMAN: Thank you. My name is David
25 Younkman, and I'm here to testify as a new resident to San